

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANITA WHITE,

Plaintiff,

v.

LADY A ENTERTAINMENT, LLC;
CHARLES KELLEY; DAVID HAYWOOD;
AND HILLARY SCOTT,

Defendants.

No. 2:20-CV-01360

**DEFENDANT CHARLES
KELLEY'S NOTICE OF JOINDER
IN MOTION TO DISMISS, OR IN
THE ALTERNATIVE, TO
TRANSFER OR STAY**

DEFENDANT CHARLES KELLEY'S NOTICE OF JOINDER IN MOTION TO
DISMISS, OR IN THE ALTERNATIVE, TO TRANSFER OR STAY
(2:20-cv-01360-RSM)

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Defendant Charles Kelley files this Notice of Joinder in Defendants Lady A Entertainment LLC's ("LAE"), David Haywood's, and Hillary Scott's (collectively with Mr. Kelley, "Defendants") Motion to Dismiss, or in the Alternative, to Transfer or Stay (the "Motion to Dismiss"). In support thereof, Mr. Kelley respectfully states the Court as follows:

On September 15, 2020, Plaintiff Anita White initiated the above-captioned action in this Court. More than two months prior, on July 8, 2020, Defendants had filed an action against Ms. White in the United States District Court for the Middle District of Tennessee relating to the same trademarks as those at issue in this action. Because of the similarity of the parties and the issues to be resolved, on October 13, 2020, LAE, Mr. Haywood, and Ms. Scott filed in this Court their Motion to Dismiss, which was based upon the first-to-file doctrine. Mr. Kelley joins in the Motion to Dismiss and incorporates by reference all arguments and evidence set forth therein.

Respectfully submitted on January 19, 2021.

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Entertainment LLC, Charles Kelley, David
Haywood, and Hillary Scott*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record were served with a copy of the foregoing through the Court's CM/ECF system on January 19, 2021.

/s/ Ambika Kumar Doran
Ambika Kumar Doran